

# EXHIBIT A

**From:** [Andrew L. Ellis](#)  
**To:** [Wakefield, Jeff](#)  
**Cc:** [Han, Anna](#); [Dove, Ronald](#); [Mincer, Jonathan](#); [Flahive Wu, Laura](#)  
**Subject:** RE: PEIA subpoenas  
**Date:** Tuesday, May 19, 2020 7:44:52 AM  
**Attachments:** [Subpoena data extract -PEIA-c1.xlsx](#)

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**[EXTERNAL]**

Jeff:

Good morning. I have not heard back from you regarding the voicemail I left you on Friday (5/15) indicating that I believe we have found a solution to the PEIA document subpoena. The following is what PEIA proposes:

- In light of the volume of the documents requested and its current limited resources, PEIA will need to use a third-party consultant to do the data-pull within the discovery deadline. The cost of that will be approximately \$4,500.00, which is to be paid by the subpoena-issuers;
- The attached spreadsheet/template is the proposed data-pull which includes the revisions we discussed on last week's conference call

Please let me know if these terms are acceptable on your end. If so, PEIA can get the third-party consultant started on it immediately, and we believe it can be completed before the discovery deadline. I look forward to hearing from you.

Thanks,

Drew

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**From:** Wakefield, Jeff <[JWakefield@flahertylegal.com](mailto:JWakefield@flahertylegal.com)>  
**Sent:** Monday, May 11, 2020 12:42 PM  
**To:** Andrew L. Ellis <[Andrew.L.Ellis@wvago.gov](mailto:Andrew.L.Ellis@wvago.gov)>  
**Cc:** Han, Anna <[AHan@cov.com](mailto:AHan@cov.com)>; Dove, Ronald <[rdove@cov.com](mailto:rdove@cov.com)>; Mincer, Jonathan <[JMincer@cov.com](mailto:JMincer@cov.com)>; Flahive Wu, Laura <[lflahivewu@cov.com](mailto:lflahivewu@cov.com)>  
**Subject:** PEIA subpoenas

Drew,

This will confirm what I told you at the beginning of our conference call today in that a new scheduling order has been entered by Judge Faber. Document discovery is now to be completed by June 12, 2020. Deposition discovery is to be completed by July 27, 2020. However, the court has also directed the parties to file motions in aid of discovery by May 15 so they can be decided by June 12. Thus, additional motion practice may be necessary given the new deadlines.

Jeff

**Jeffrey M. Wakefield**

Member

**Flaherty**

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